

Exhibit E

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION, et al.,

Plaintiffs and Counterclaim
Defendants;

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

Defendants and
Counterclaim Plaintiffs.

Case No. 4:16-cv-02163

**OBJECTIONS AND RESPONSES TO COUNTERCLAIM PLAINTIFFS' SECOND
REQUESTS FOR ADMISSION TO COUNTERCLAIM DEFENDANT CONNIE
BRAUN CASEY**

COMES NOW Counterclaim Defendant Connie Braun Casey, by and through the undersigned counsel, and in response to Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc.'s and Angela Scott's (together, "Counterclaim Plaintiffs") second requests for admission directed to Counterclaim Defendant Connie Braun Casey, states as follows:

MATTERS REQUESTED TO BE ADMITTED

1. Admit the genuineness of the document attached to Counterclaim Plaintiffs' Second Requests for Admission to Counterclaim Defendant Missouri Primate Foundation, served on Counterclaim Defendants on February 23, 2018 (hereinafter "attached"), as Exhibit 1 (bearing Bates numbers PETA-00001 to PETA-00002).

RESPONSE: Defendant Connie Braun Casey ("Ms. Casey") has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

2. Admit the genuineness of the document attached as Exhibit 2 (bearing Bates number PETA-00003).

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit its genuineness, and therefore denies same.

3. Admit the genuineness of the document attached as Exhibit 3 (bearing Bates number PETA-00004).

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit its genuineness, and therefore denies same.

4. Admit the genuineness of the document attached as Exhibit 4 (bearing Bates numbers PETA-00005 to PETA-00006).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

5. Admit the genuineness of the document attached as Exhibit 5 (bearing Bates numbers PETA-00007 to PETA-00047).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

6. Admit the genuineness of the document attached as Exhibit 6 (bearing Bates numbers PETA-00048 to PETA-00053).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

7. Admit the genuineness of the document attached as Exhibit 7 (bearing Bates numbers PETA-00054 to PETA-00069).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

8. Admit the genuineness of the document attached as Exhibit 8 (bearing Bates numbers PETA-00070 to PETA-00072).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

9. Admit the genuineness of the document attached as Exhibit 9 (bearing Bates numbers PETA-00073 to PETA-00074).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

10. Admit the genuineness of the document attached as Exhibit 10 (bearing Bates numbers PETA-00075 to PETA-00086).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

11. Admit the genuineness of the document attached as Exhibit 11 (bearing Bates numbers PETA-00087 to PETA-00088).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

12. Admit the genuineness of the document attached as Exhibit 12 (bearing Bates number PETA-00089).

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit its genuineness, and therefore denies same.

13. Admit the genuineness of the document attached as Exhibit 13 (bearing Bates numbers PETA-00090 to PETA-00109).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

14. Admit the genuineness of the document attached as Exhibit 14 (bearing Bates numbers PETA-00110 to PETA-00111).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

15. Admit the genuineness of the document attached as Exhibit 15 (bearing Bates numbers PETA-00112 to PETA-00117).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

16. Admit the genuineness of the document attached as Exhibit 16 (bearing Bates numbers PETA-00118 to PETA-00119).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

17. Admit the genuineness of the document attached as Exhibit 17 (bearing Bates number PETA-00120).

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit its genuineness, and therefore denies same.

18. Admit the genuineness of the document attached as Exhibit 18 (bearing Bates number PETA-00121).

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit its genuineness, and therefore denies same.

19. Admit the genuineness of the document attached as Exhibit 19 (bearing Bates numbers PETA-00122 to PETA-00123).

RESPONSE: Ms. Casey has no personal knowledge as to the identified documents, when, where, how or by whom the documents were created, and lacks the knowledge or information sufficient to admit their genuineness, and therefore denies same.

20. Admit the genuineness of the document attached as Exhibit 20 (bearing Bates number PETA-00124).

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit its genuineness, and therefore denies same.

21. Admit that the photograph bearing Bates number PETA-00013, described in the attached Exhibit 5 as “Feeder and enrichment item have not been cleaned/sanitized all summer,” accurately portrays the condition and appearance of the depicted feeder and enrichment item on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

22. Admit that the photograph bearing Bates number PETA-00014, described in the attached Exhibit 5 as “Close up photo of: Feeder and enrichment item have not been cleaned/sanitized all summer,” accurately portrays the condition and appearance of the depicted feeder and enrichment item on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

23. Admit that the photograph bearing Bates number PETA-00015, described in the attached Exhibit 5 as “Close up photo of: Feeder and enrichment item have not been cleaned/sanitized all summer,” accurately portrays the condition and appearance of the depicted feeder and enrichment item on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

24. Admit that the photograph bearing Bates number PETA-00016, described in the attached Exhibit 5 as "Enrichment items inside enclosure have not been cleaned sanitized all summer," accurately portrays the condition and appearance of the enclosure and enrichment items inside the inspected enclosure on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

25. Admit that the photograph bearing Bates number PETA-00017, described in the attached Exhibit 5 as "Close up photo of: Enrichment items inside enclosure have not been cleaned sanitized all summer," accurately portrays the condition and appearance of the enclosure and enrichment items inside the inspected enclosure on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

26. Admit that the photograph bearing Bates number PETA-00018, described in the attached Exhibit 5 as "Water receptacle (used for enrichment-not drinking water) hasn't been cleaned/sanitized all summer," accurately portrays the condition and appearance of the receptacle on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

27. Admit that the photograph bearing Bates number PETA-00019, described in the attached Exhibit 5 as "Close up photo of: Water receptacle (used for enrichment-not drinking water) hasn't been cleaned/sanitized all summer," accurately portrays the condition and appearance of the receptacle on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

28. Admit that the photograph bearing Bates number PETA-00020, described in the attached Exhibit 5 as "Indoor enclosures have bedding and other debris caked on them," accurately portrays the condition and appearance of the bedding on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

29. Admit that the photograph bearing Bates number PETA-00021, described in the attached Exhibit 5 as "Close up photo of: Indoor enclosures have bedding and other debris caked on them," accurately portrays the condition and appearance of the bedding on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

30. Admit that the photograph bearing Bates number PETA-00022, described in the attached Exhibit 5 as "Open bag of food. Area around food not being cleaned. Misc junk and random items," accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

31. Admit that the photograph bearing Bates number PETA-00023, described in the attached Exhibit 5 as "Close up photo of: Open bag of food. Area around food not being cleaned. Misc junk and random items," accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

32. Admit that the photograph bearing Bates number PETA-00024, described in the attached Exhibit 5 as "Another view of: Open bag of food. Area around food not being cleaned. Misc junk and random items. Rodent droppings," accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

33. Admit that the photograph bearing Bates number PETA-00025, described in the attached Exhibit 5 as "Close up photo of: Another view of: Open bag of food. Area around food not being cleaned. Misc junk and random items. Rodent droppings," accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

34. Admit that the photograph bearing Bates number PETA-00026, described in the attached Exhibit 5 as "Overview of: Area around food not being cleaned. Misc junk and random items," accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

35. Admit that the photograph bearing Bates number PETA-00027, described in the attached Exhibit 5 as "More junk and clutter in animal housing room. Area not being cleaned very well. Rodent droppings," accurately portrays the condition and appearance of the animal housing room on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

36. Admit that the photograph bearing Bates number PETA-00028, described in the attached Exhibit 5 as "Close up photo of: More junk and clutter in animal housing room. Area not being cleaned very well. Rodent droppings," accurately portrays the condition and appearance of the animal housing room on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

37. Admit that the photograph bearing Bates number PETA-00029, described in the attached Exhibit 5 as "Licensee stated she cannot clean/sanitize dirt/grime from wall of indoor

enclosure because animal is too aggressive to allow her in cage,” accurately portrays the condition and appearance of the depicted enclosure on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

38. Admit that the photograph bearing Bates number PETA-00030, described in the attached Exhibit 5 as “Close up photo of: Licensee stated she cannot clean/sanitize dirt/grime from wall of indoor enclosure because animal is too aggressive to allow her in cage,” accurately portrays the condition and appearance of the depicted enclosure on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

39. Admit that the photograph bearing Bates number PETA-00031, described in the attached Exhibit 5 as “Junction between wall and ceiling in indoor enclosure is not being cleaned sanitized appropriately,” accurately portrays the condition and appearance of the junction between wall and ceiling in the indoor enclosure on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

40. Admit that the photograph bearing Bates number PETA-00032, described in the attached Exhibit 5 as “Close up photo of: Junction between wall and ceiling in indoor enclosure is not being cleaned sanitized appropriately,” accurately portrays the condition and appearance of the junction between wall and ceiling in the indoor enclosure on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

41. Admit that the photograph bearing Bates number PETA-00033, described in the attached Exhibit 5 as “Bedding is stored outside, on the ground and against a wall,” accurately portrays the condition and appearance of the stored bedding on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

42. Admit that the photograph bearing Bates number PETA-00034, described in the attached Exhibit 5 as “Trash receptacle (on right) has no lid and is right next to a lot of clutter. Note rodent droppings on floor,” accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

43. Admit that the photograph bearing Bates number PETA-00035, described in the attached Exhibit 5 as “Trash receptacle (in animal housing room) has no lid,” accurately portrays the condition and appearance of the trash receptacle in the animal housing room on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

44. Admit that the photograph bearing Bates number PETA-00036, described in the attached Exhibit 5 as "Sharp points protruding into enclosure," accurately portrays the condition and appearance of the sharp points protruding into the depicted enclosure on September 17, 2013.
RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

45. Admit that the photograph bearing Bates number PETA-00037, described in the attached Exhibit 5 as "Singly-housed baboon has excessive hairloss on arms, legs, and tail," accurately portrays the condition and appearance of the depicted baboon on September 17, 2013.
RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

46. Admit that the photograph bearing Bates number PETA-00038, described in the attached Exhibit 5 as "Food on enclosure floor is attracting ants," accurately portrays the condition and appearance of the depicted enclosure floor on September 17, 2013.
RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

47. Admit that the photograph bearing Bates number PETA-00039, described in the attached Exhibit 5 as "Close up photo of: Food on enclosure floor is attracting ants," accurately portrays the condition and appearance of the depicted enclosure floor on September 17, 2013.
RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

48. Admit that the photograph bearing Bates number PETA-00040, described in the attached Exhibit 5 as “Feeder is permanently attached so it cannot be readily cleaned and sanitized,” accurately portrays the condition and appearance of the depicted feeder on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

49. Admit that the photograph bearing Bates number PETA-00041, described in the attached Exhibit 5 as “Close up photo of: Feeder is permanently attached so it cannot be readily cleaned and sanitized,” accurately portrays the condition and appearance of the depicted feeder on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

50. Admit that the photograph bearing Bates number PETA-00042, described in the attached Exhibit 5 as “Feeder is permanently attached and licensee states animal is aggressive so it cannot be readily cleaned and sanitized,” accurately portrays the condition and appearance of the depicted feeder on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

51. Admit that the photograph bearing Bates number PETA-00043, described in the attached Exhibit 5 as “Close up photo of: Feeder is permanently attached and licensee states animal

is aggressive so it cannot be readily cleaned and sanitized,” accurately portrays the condition and appearance of the depicted feeder on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

52. Admit that the photograph bearing Bates number PETA-00044, described in the attached Exhibit 5 as “Water bottle was empty. When it got filled, two capuchins drank more than half the bottle in less than 3 minutes,” accurately portrays the condition and appearance of the depicted water bottle on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

53. Admit that the photograph bearing Bates number PETA-00045, described in the attached Exhibit 5 as “Mouse in housing room faintly viewable behind board which is furthest to the right,” accurately portrays the condition and appearance of the housing room on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

54. Admit that the photograph bearing Bates number PETA-00046, described in the attached Exhibit 5 as “Close up photo of: Trash receptacle (on right) has no lid and is right next to a lot of clutter. Note rodent droppings on the floor,” accurately portrays the condition and appearance of the inspected area on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

55. Admit that the photograph bearing Bates number PETA-00047, described in the attached Exhibit 5 as “Trash with no lid and open bag near primate enclosures,” accurately portrays the condition and appearance of the area near the primate enclosures on September 17, 2013.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

56. Admit that the photographs bearing Bates number PETA-00059, described in the attached Exhibit 7 as “Close up photo of: Sharp points formed by broken/bent fine wire. Fencing of enclosure wall is not being cleaned/sanitized properly,” accurately portray the condition and appearance of the inspected enclosure on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

57. Admit that the photograph bearing Bates number PETA-00060, described in the attached Exhibit 7 as “Sharp points formed by broken/bent wire. Fencing of enclosure wall is not being cleaned/sanitized properly,” accurately portrays the condition and appearance of the inspected enclosure on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

58. Admit that the photograph bearing Bates number PETA-00060, described in the attached Exhibit 7 as “Sharp points formed by broken/bent wire on right side of enclosure. Brown material caked on fencing of capuchin enclosure,” accurately portrays the condition and appearance of the inspected enclosure on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

59. Admit that the photograph bearing Bates number PETA-00061, described in the attached Exhibit 7 as “Feeder is not being cleaned/sanitized properly,” accurately portrays the condition and appearance of the inspected enclosure on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

60. Admit that the photograph bearing Bates number PETA-00062, described in the attached Exhibit 7 as “Close up photo of: Feeder is not being cleaned/sanitized properly,” accurately portrays the condition and appearance of the inspected enclosure on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

61. Admit that the photograph bearing Bates number PETA-00063, described in the attached Exhibit 7 as “Adult, female chimpanzee, ‘Crystal’, has excessive hair loss on arms, legs, chest, and belly,” accurately portrays the condition and appearance of the chimpanzee named Crystal on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

62. Admit that the photograph bearing Bates number PETA-00064, described in the attached Exhibit 7 as “Adult, female chimpanzee, ‘Tammy’, has excessive, generalized hair loss,” accurately portrays the condition and appearance of the chimpanzee named Tammy on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

63. Admit that the photograph bearing Bates number PETA-00065, described in the attached Exhibit 7 as “Adult, female baboon, ‘Leona’, is singly housed and has excessive hair loss on arms and legs. The enrichment program does not address her needs as an individually housed animal,” accurately portrays the condition and appearance of the baboon named Leona on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

64. Admit that the photograph bearing Bates number PETA-00066, described in the attached Exhibit 7 as “An adult cinnamon capuchin, ‘Coco’, has excessive hair loss on her hind end, near the base of her tail,” accurately portrays the condition and appearance of the capuchin named Coco on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

65. Admit that the photograph bearing Bates number PETA-00067, described in the attached Exhibit 7 as “Trash is not a receptacle with a tight fitting lid,” accurately portrays the condition and appearance of trash on the inspection site on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

66. Admit that the photograph bearing Bates number PETA-00068, described in the attached Exhibit 7 as “Debris and waste collecting in corner of pink room just a few feet away from animal enclosure,” accurately portrays the condition and appearance of debris and waste collecting in the corner of the pink room on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

67. Admit that the photograph bearing Bates number PETA-00069, described in the attached Exhibit 7 as “Enriching items, including perch and toy are not being cleaned/sanitized properly,” accurately portrays the condition and appearance of the depicted enriching items on January 7, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

68. Admit that the photograph bearing Bates number PETA-00078, described in the attached Exhibit 10 as “Open bag of food in animal area is not in a container with a tight fitting lid,” accurately portrays the condition and appearance of the inspected animal area on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

69. Admit that the photograph bearing Bates number PETA-00079, described in the attached Exhibit 10 as “Bedding in tortoise enclosure, directly adjacent to chimp enclosure is not getting cleaned properly,” accurately portrays the condition and appearance of the bedding in the tortoise enclosure on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

70. Admit that the photograph bearing Bates number PETA-00080, described in the attached Exhibit 10 as “Close up photo of: Bedding in tortoise enclosure, directly adjacent to chimp enclosure is not getting cleaned properly,” accurately portrays the condition and appearance of the bedding in the tortoise enclosure on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

71. Admit that the photograph bearing Bates number PETA-00081, described in the attached Exhibit 10 as “Catch pan just a couple of inches beneath wire floor in outdoor shelter has

an accumulation of old waste/feces,” accurately portrays the condition and appearance of the inspected area on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

72. Admit that the photograph bearing Bates number PETA-00082, described in the attached Exhibit 10 as “Close up photo of: Catch pan just a couple of inches beneath wire floor in outdoor shelter has an accumulation of old waste/feces,” accurately portrays the condition and appearance of the inspected area on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

73. Admit that the photograph bearing Bates number PETA-00083, described in the attached Exhibit 10 as “Dirty rag hanging on chimpanzee enclosure wall,” accurately portrays the condition and appearance of the depicted rag hanging on the chimpanzee enclosure wall on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

74. Admit that the photograph bearing Bates number PETA-00084, described in the attached Exhibit 10 as “Close up photo of: Dirty rag hanging on chimpanzee enclosure wall,” accurately portrays the condition and appearance of the depicted rag hanging on the chimpanzee enclosure wall on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

75. Admit that the photograph bearing Bates number PETA-00085, described in the attached Exhibit 10 as “Chimpanzee enclosure in ‘pink room’ is not being cleaned/sanitized properly,” accurately portrays the condition and appearance of the “pink room” on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

76. Admit that the photograph bearing Bates number PETA-00086, described in the attached Exhibit 10 as “Close up photo of: Chimpanzee enclosure in ‘pink room’ is not being cleaned/sanitized properly,” accurately portrays the condition and appearance of the “pink room” on April 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

77. Admit that the photographs bearing Bates numbers PETA-00093 to PETA-00094, described in the attached Exhibit 13 as “Several cockroaches in the corner of the chimpanzee green enclosure,” accurately portray the condition and appearance of the corner of the chimpanzee green enclosure on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

78. Admit that the photograph bearing Bates number PETA-00095, described in the attached Exhibit 13 as “Several cockroaches on the frame of the chimpanzee green enclosure,” accurately portrays the condition and appearance of the frame of the chimpanzee green enclosure on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

79. Admit that the photographs bearing Bates numbers PETA-00096 to PETA-00097, described in the attached Exhibit 13 as “Collection of miscellaneous items in the corner of green enclosure viewing room,” accurately portray the condition and appearance of the corner of the green enclosure viewing room on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

80. Admit that the photograph bearing Bates number PETA-00098, described in the attached Exhibit 13 as “Gibbon housing shelter had dirt and grime built up,” accurately portrays the condition and appearance of the gibbon housing shelter on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

81. Admit that the photograph bearing Bates number PETA-00099, described in the attached Exhibit 13 as “Close up of gibbon housing shelter with dirt and grime build up in the corner,” accurately portrays the condition and appearance of a corner of the gibbon housing shelter on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

82. Admit that the photographs bearing Bates numbers PETA-00100 to PETA-00101, described in the attached Exhibit 13 as “Macaques’ enclosure with debris and fecal material on the floor,” accurately portray the condition and appearance of the macaques’ enclosure on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

83. Admit that the photograph bearing Bates number PETA-00102, described in the attached Exhibit 13 as “Build up of trash in chimpanzee connector tunnels,” accurately portrays the condition and appearance of the chimpanzee connector tunnels on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

84. Admit that the photograph bearing Bates number PETA-00103, described in the attached Exhibit 13 as “Build up of trash and waste in chimpanzee connector tunnels,” accurately portrays the condition and appearance of the chimpanzee connector tunnels on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

85. Admit that the photograph bearing Bates number PETA-00104, described in the attached Exhibit 13 as “On the bottom of Joey’s enclosure, there was a build up of food waste,” accurately portrays the condition and appearance of the bottom of Joey’s enclosure on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

86. Admit that the photograph bearing Bates number PETA-00105, described in the attached Exhibit 13 as “In the pink room, line of grime above the top of the enclosure,” accurately portrays the condition and appearance of the pink room on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

87. Admit that the photograph bearing Bates number PETA-00106, described in the attached Exhibit 13 as “In the pink room, close up of line of grime above the top of the enclosure,” accurately portrays the condition and appearance of the pink room on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

88. Admit that the photograph bearing Bates number PETA-00107, described in the attached Exhibit 13 as “Line of dirt and grime at the base of chimpanzee enclosure on the floor of pink room,” accurately portrays the condition and appearance of the pink room on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

89. Admit that the photograph bearing Bates number PETA-00108, described in the attached Exhibit 13 as “Mister pipe covered in flyspeck,” accurately portrays the condition and appearance of the inspected area on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

90. Admit that the photograph bearing Bates number PETA-00109, described in the attached Exhibit 13 as “Cobwebs and dust on vents in the pink room,” accurately portrays the condition and appearance of the vents in the pink room on October 29, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

91. Admit that the photographs bearing Bates numbers PETA-00115 to PETA-00116, described in the attached Exhibit 15 as “Buildup of dirt and grime on metal bar and blue wooden border,” accurately portray the condition and appearance of the inspected area on December 9, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

92. Admit that the photograph bearing Bates number PETA-00117, described in the attached Exhibit 15 as “Buildup of dirt and grime on metal bars within enclosure,” accurately portrays the condition and appearance of the inspected area on December 9, 2014.

RESPONSE: Ms. Casey has no personal knowledge as to the identified document, when, where, how or by whom the document was created, and lacks the knowledge or information sufficient to admit the documents portrayal on the specific date, and therefore denies same.

Dated this 20th day of June, 2018.

Respectfully Submitted,

KLAR, IZSAK & STENGER, L.L.C.

By:


BRIAN D. KLAR, #36430
DANIEL T. BATTEN, #58810
Attorneys for Co-Defendant
1505 S. Big Bend Blvd.
St. Louis, Missouri 63117
Phone: 314-863-1117
Fax: 314-863-1118
Email: bklar@lawsaintlouis.com
dbatten@lawsaintlouis.com

VERIFICATION

I, Connie Casey, hereby verify under penalty of perjury under the laws of the United States of America that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Executed on Sept 14, 2018.

Connie Casey

Name

individual

Title

CERTIFICATE OF SERVICE

I hereby certify that on **June 20, 2018**, the foregoing was service by first class mail, postage prepaid, to the following:

POLSINELLI PC
KELLY J. MUENSTERMAN (#66968)
JAMES P. MARTIN (#50170)
100 S. Fourth Street, Suite 1000
St. Louis, MO 63102
314.889.8000
Fax No: 314.231.1776
kmuensterman@polsinelli.com
jmartin@polsinelli.com

PETA FOUNDATION
JARED S. GOODMAN
(Admitted *Pro Hac Vice*)
2154 W. Sunset Blvd.
Los Angeles, CA 90032
323.210.2266
Fax No: 213.484.1648
*Attorneys for Defendant/Counterclaim
Plaintiff*

Patrick J. Hanley, Esq.
214 E. Fourth Street
Covington, KY 41011
*Attorney for Plaintiff/Counterclaim
Defendant Vito Stramaglia*

Missouri Primate Foundation
12338 State Road CC
Festus, MO 63028

Geordie Duckler
9397 SW Locust Street
Tigard, OR 97223
geordied@animallawpractice.com
*Attorneys for Plaintiff/Counterclaim
Defendant Andrew Sawyer*

/s/ Daniel T. Batten

A handwritten signature in dark ink, appearing to read 'D. Batten', written over a horizontal line.